

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

INTEGRAND ASSURANCE COMPANY

Plaintiff,

v.

EVEREST REINSURANCE COMPANY;
ODYSSEY REINSURANCE COMPANY; CATLIN
(XL CATLIN) UNDERWRITING INC., MIAMI
ON BEHALF OF LLOYD'S SYNDICATE 2003,
LONDON; SWISS REINSURANCE AMERICA
CORPORATION ARMONK; ALLIED WORLD
RE ON BEHALF OF LLOYD'S SYNDICATE
2232, LONDON; MS AMLIN P/C; ASPEN
INSURANCE UK LIMITED TRADING AS
ASPEN RE LONDON, ENGLAND; LIBERTY
SPECIALTY SERVICES LTD LIB 4472, PARIS
OFFICE UNDERWRITING FOR AND ON
BEHALF OF LLOYD'S SYNDICATE NO. 4472

Defendant.

Civil No. 19-cv-01111-DRD

**INFORMATIVE MOTION REGARDING
DEFENDANTS' UNANIMOUS CONSENT TO REMOVAL**

TO THE HONORABLE COURT:

COMES NOW the Co-Defendant ODYSSEY REINSURANCE COMPANY ("**Odyssey Re**") by and through its undersigned counsel, and respectfully informs this Court of Defendants unanimous consent to removal:

1. On this date, codefendant Allied World Re on Behalf of Lloyd's Syndicate 2232 ("**Allied**") notified to Odyssey Re's counsel its consent to the removal to Federal Court of the action filed by Integrand Assurance Company in the Court of First Instance for the Commonwealth of Puerto Rico, San Juan Part, against the captioned defendants, and assigned case number SJ2019CV01015 (the "**Superior Court Action**"). See Exhibit 1 hereto.

2. On February 27, 2019, Swiss Reinsurance America Corporation Armonk (“**Swiss Re**”) filed its Notice of Consent to Removal [Docket Number 19].

3. On this date, Catlin (XL Catlin) Underwriting Inc., For and On Behalf of Lloyd’s Underwriting Syndicate No. 2003 (“**Catlin XL**”), MS Amlin Underwriting Limited, For and On Behalf of Lloyd’s Underwriting Syndicate No. 2001 and Lloyd’s Underwriting Syndicates No. 0623, 2623, 1084, 2010, 2088, 2791, 4020, and 5678 (“**MS Amlin**”), Aspen Insurance UK Limited (“**Aspen**”), and Liberty Specialty Services Ltd., For and On Behalf of Lloyd’s Syndicate No. 4472 (“**Liberty**”) have also filed their Consent to Removal [Docket 22].

4. Everest Reinsurance Company (“**Everest Re**”) has filed its Notice of Consent to Removal on this date as well [Docket Number 25].

5. Consequently, all eight Defendants have sought, joined or consented to the removal of the Superior Court Action to this Honorable Court.¹

WHEREFORE, Odyssey Re respectfully requests that this Honorable Court take notice that Defendants Allied, Swiss Re, Catlin XL, MS Amlin, Aspen, Liberty and Everest Re have all consented to the Notice of Removal filed by Odyssey Re [Docket Number 1], that this constitutes unanimous consent by all Defendants, and it thus deem the Removal perfected.

RESPECTFULLY SUBMITTED.

We hereby certify that on this same date, we electronically filed the foregoing answer to the complaint with the Clerk of the Court using the CM/ECF system which will send notification of such

¹ Because all the Defendants have consented to the removal, Odyssey Re does not at this time need to take a position as to whether all defendants have been properly joined or as to whether this Honorable Court, in light of the remedies sought in the Amended Complaint [Docket Number 11], has jurisdiction on grounds additional to those stated in the Notice of Removal.

filing to all attorneys of record.

In San Juan, Puerto Rico, on this March 4, 2019.

Respectfully submitted,

**ADSUAR MUÑIZ GOYCO SEDA
& PÉREZ-OCHOA, P.S.C.**

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